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COUNSEL FOR THE DEBTOR IN POSSESSION

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

| | | |
|----------------------|---|--------------------------|
| IN RE: | § | Chapter 11 |
| | § | |
| 1300 CAMPBELL, L.P., | § | Case No. 09-36300-SGJ-11 |
| | § | |
| Debtor. | § | |

**MOTION FOR EXPEDITED HEARING ON MOTION FOR APPROVAL OF DEBTOR
IN POSSESSION FINANCING PURSUANT TO 11 U.S.C. § 364(d)**

TO THE HONORABLE STACEY G. C. JERNIGAN, UNITED STATES BANKRUPTCY JUDGE:

1300 Campbell, L.P. ("Debtor") hereby requests expedited consideration of its Motion for Approval of Debtor in Possession Financing Pursuant to 11 U.S.C. § 364(d) (the "Motion").

Expedited consideration of the Motion is vital to the continued operation of the business of the Debtor as well as preservation of value of the estate of the Debtor.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that the Court grant this request and set the Motion for hearing on December 7, 2009 at 1:30 p.m. or at a time the Court deems appropriate and for such other and further relief, at law or in equity, to which Debtor may be shown justly entitled.

Dated this the 20th day of November, 2009.

Respectfully submitted,

GOODRICH POSTNIKOFF &
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By: /s/ Joseph F. Postnikoff

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CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with F. Beth Morgan, counsel for GE, regarding this Motion and am advised the Motion is opposed.

/s/ Joseph F. Postnikoff

Joseph F. Postnikoff